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## RECEIVED

MAR 2 2023

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI DIVISION

|   | )   |
|---|---|
| Plaintiff(s), Cherry Yolanda Bell   | )<br>)<br>)   |
| v.  | ) Case No   |
|   | ) (to be assigned by Clerk of District Court)   |
| Emplayment Connections  | )   |
| en paginent   | ) JURY TRIAL DEMANDED   |
|   | ) YES NO  |
| Defendant(s). (Enter above the full name(s)                                       | )   |
| of all defendants in this lawsuit. Please attach additional sheets if necessary.) | )   |
|   | ,   |
| EMPLOYMENT DISCRIM  | INATION COMPLAINT   |
| 1. This employment discrimination la  | wsuit is based on (check only those that apply):  |
|   | , as amended, 42 U.S.C. §§ 2000e, et seq., for race, color, religion, gender, or national origin. |

NOTE: In order to bring suit in federal district court under Title VII, you must first obtain

Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, et seq., for

**NOTE**: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity

Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, et seq.,

**NOTE**: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment

a right-to-sue letter from the Equal Employment Opportunity Commission.

employment discrimination on the basis of age (age 40 or older).

for employment discrimination on the basis of disability.

Commission.

Opportunity Commission.

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Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or

NOTE: In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or

activity receiving federal financial assistance.

agency.

SEPARATE SHEET OF PAPER.

| F. | Other | (Describe) Retaliation   |
|----|-------|--|
|    |       |  |
|    |       |  |
|    |       | PARTIES  |
|    | 2.    | Plaintiff's name: Merry Golarda Bell                                 |
|    |       | Plaintiff's address: 2de State Freet                                 |
|    |       | Street address or P.O. Box   |
|    |       | City/ County/ State/Zip Code   |
|    |       | 118 491-1197   |
|    |       | Area code and telephone number                                       |
|    | 3.    | Defendant's name: Employment Connections                             |
|    |       | Defendant's address:   |
|    |       | Street address or P.O. Box   |
|    |       | 2838 Market Street St. Louis Mo<br>City/County/State/Zip Code (3103) |
|    |       | 314. 333. 5627   |
|    |       | Area code and telephone number                                       |
|    |       |  |

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A

|           | 4.<br>provide    |            | re claimin<br>owing info | _                   | ninatory con | iduct occu   | rred at a different location, |
|-----------|------------------|------------|--------------------------|---------------------|--------------|--------------|-------------------------------|
| (Street A | Addres           | ss)        |                          | (City/County)       |              | (State)      | (Zip Code)                    |
| ;         | 5.               | When d     | id the disc              | erimination occu    | r? Please gi | ive the dat  | e or time period:             |
|           | Dec              | emb        | es 14                    | th 2022             | _            |              |                               |
|           |                  |            | AD                       | MINISTRATIV         | E PROCE      | <u>DURES</u> |                               |
| (         | 6.               | Did you    | i file a cha             | arge of discrimin   | ation agains | st the defe  | ndant(s) with the Missouri    |
| Commis    | ssion c          | on Huma    | n Rights?                |                     |              |              |                               |
|           | 4                | Yes        | Date filed               | 20602               | 550          |              |                               |
|           | Deliver de de co |            |                          |                     |              |              |                               |
| ,         | 7.               | Did you    | ı file a ch              | narge of discrim    | ination agai | inst the de  | fendant(s) with the Equal     |
| Employ    | ment (           | Opportur   | ity Comm                 | ission or other f   | ederal agend | cy?          |                               |
|           | W.               | Yes D      | ate filed:               | 2.6.5               | 023_         |              |                               |
| -         |                  |            |                          |                     |              |              |                               |
| :         | 8.               | Have yo    | ou receive               | d a Notice of Ri    | ght-to-Sue I | _etter?      |                               |
|           |                  | Y          | es                       |                     | N            | No           |                               |
| If yes, p | olease a         | attach a c | copy of the              | e letter to this co | mplaint.     |              |                               |
| 9         | 9.               | If you a   | re claimin               | g age discrimina    | tion, check  | one of the   | following:                    |
| -         | (                | 60 days o  | or more ha               | we passed since     | I filed my c | harge of a   | ge discrimination with the    |
| Equal E   | Employ           | ment Op    | portunity                | Commission.         |              |              |                               |
| -         | i                | fewer tha  | n 60 days                | have passed sinc    | e I filed my | charge of a  | age discrimination with the   |
| Equal E   | Employ           | ment Op    | portunity                | Commission.         |              |              |                               |

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## NATURE OF THE CASE

| 10.   | The conduct complained of in this lawsuit involves (check only those that apply): |
|-------|---|
|       | failure to hire me  |
|       | termination of my employment  |
|       | failure to promote me   |
|       | failure to accommodate my disability  |
|       | terms and conditions of my employment differ from those of similar employees      |
|       | + retaliation   |
|       | harassment  |
|       | other conduct (specify):  |
|       |   |
|       |   |
|       |   |
| Did y | ou complain about this same conduct in your charge of discrimination?             |
|       | YesNo   |
|       |   |

| 11.            | I believe that I was discriminated against because of my (check all that apply):  |
|----------------|---|
|                | ** race   |
|                | religion  |
|                | national origin   |
|                | color   |
|                | gender  |
|                | disability  |
|                | age (birth year is:)  |
|                | other:  |
|                |   |
| Did yo         | ou state the same reason(s) in your charge of discrimination?   |
|                | Yes No  |
| is involved in | State here, as briefly and clearly as possible, the essential facts of your claim. ifically the conduct that you believe is discriminatory and describe how each defendant the conduct. Take time to organize your statement; you may use numbered paragraphs nelpful. It is not necessary to make legal arguments, or to cite cases or statutes.   |
| I was &        | nelpful. It is not necessary to make legal arguments, or to cite cases or statutes.  Dexually harassed on multiple occasions by hard Hatley hard on multiple occasions by Tamare harassed on multiple occasions by Tamare   |
| I was h        | largesed on moltiple  |
| Williams       | Capalisa Kada Humphray  |
| T was          | harassed by my soparate David Kesset  |
| On Decem       | harassed by my Sopervisor Karla Humphrey horassed by my Sopervisor Karla Humphrey hoper 8th 2022 I met with David Kessel bler 8th 2022 I met with David Kessel bler 3th 2th 2th 2th 2th 2th 2th 2th 2th 2th 2 |
| (              |   |
| and mad        | e a verta Complaint Filed a formal Complain   |
| put the        | Complaint in writing as fixed on Donald !!  |
| on Deck        | complaint in writing. I filed a formal Complain complaint in writing. I was fired on Domball ember 12, 2022. I was fired on Domball of 14,2022 see paperwork attacked   |
| December       | -14,2026 See Page   |

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Mrs. tarka tumphing retaliated against me by
making up false complaint letters and refusing
to pay maney owed to me during my time at
employment annoation

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

are still being committed by the defendant.

\_\_\_ are no longer being committed by the defendant.

may still be being committed by the defendant.

## REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

I would lik the court to award me Compensatory and punitive damages. Thank for

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 2 day of March , 20 2023.

Signature of Plaintiff